

Nico Banks (CA SBN:344705)
BANKS LAW OFFICE
712 H St NE, Unit #8571
Washington, DC 20002
Tel.: 971-678-0036
Email: nico@bankslawoffice.com

Richard A. Nervig (CA SBN:226449)
RICHARD A. NERVIG, P.C.
501 West Broadway, Suite 800
San Diego, CA 92101
Phone: 760-451-2300
Email: richard@nerviglaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH; *et al.*

Plaintiffs,

vs.

RYAN CARROLL; *et al.*

Defendants.

Case No.: 2:24-cv-02886-WLH-SK

**STIPULATION TO STAY
DEFENDANTS TOTAL APPS AND
REYHAN PASINLI'S TIME TO
FILE A RESPONSIVE PLEADING
PENDING PLAINTIFFS'
FORTHCOMING SECOND
AMENDED COMPLAINT**

Presiding Judge: Hon. Wesley L. Hsu
Trial Date: N/A

**STIPULATION TO STAY DEFENDANTS TOTAL APPS AND REYHAN
PASINLI'S TIME TO FILE A RESPONSIVE PLEADING PENDING
PLAINTIFFS' FORTHCOMING SECOND AMENDED COMPLAINT**

1 This Stipulation is entered into by and between Plaintiffs on the one hand, and
2 Defendants Total Apps and Reyhan Pasinli, on the other hand, through their
3 respective counsel of record.
4

5 WHEREAS, Plaintiffs have received third-party documents and intend to
6 amend the currently operative First Amended Complaint to add new defendants and
7 new allegations about existing defendants;
8

9 WHEREAS, Plaintiffs require additional time to investigate entities and
10 individuals to potentially be added as defendants, and to further investigate
11 forthcoming new allegations about existing defendants;
12

13 WHEREAS, Plaintiffs anticipate receiving additional discovery from Wells
14 Fargo, Thread Bank, Bank of America, and JP Morgan—including discovery of
15 account statements, wire transfers, and third-party-agent/payment-processor
16 transaction data—within the next six weeks;
17

18 WHEREAS, Plaintiffs anticipate that the new discovery, will significantly
19 further inform Plaintiffs' allegations;
20

21 WHEREAS, it would be most efficient—and in the interests of justice—for
22 Plaintiffs to wait to file a second amended complaint until Plaintiffs have reviewed
23 the forthcoming discovery that they anticipate receiving shortly;
24

25 WHEREAS, it would also be inefficient for Defendants to respond to the
26 currently operative complaint when the parties anticipate that another amended
27 complaint will be filed;
28

1 IT IS HEREBY STIPULATED AND AGREED by the parties as follows:

2 The deadline for Defendants Total Apps and Reyhan Pasinli to file responsive
3 pleadings to the current complaint should be stayed.

4
5 Total Apps and Reyhan Pasinli should be ordered to file a responsive pleading
6 no later than 30 days from the date Plaintiffs file their amended complaint.

7 This stipulation is made without prejudice to any party's right to seek further
8 extensions or modifications by agreement or by order of the Court for good cause.
9

10 **IT IS SO STIPULATED.**

11 Dated: July 24, 2024
12

13
14 /s/ Nico Banks
15 Nico Banks (CA SBN:344705)
16 *Attorney for Plaintiffs*

17 /s/Geoff Brethen
18 Geoff Brethen (CA SBN: 259873)
19 *Attorney for Defendants Total*
20 *Apps and Reyhan Pasinli*

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WORD COUNT COMPLIANCE CERTIFICATION

The undersigned, counsel of record for Plaintiffs, certifies that this stipulation contains fewer than 7,000 words, which complies with the word limit of L.R. 11-6.1

/s/Nico Banks

Nico Banks

Dated: July 24, 2024

ATTESTATION

Pursuant to L.R. 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Nico Banks
Nico Banks

CERTIFICATE OF SERVICE

On July 24, 2024, I served this motion and accompanying papers via first-class mail to the parties listed below with addresses below their names, and via email to the parties with email addresses below their names:

JARED DAY;
19710 Chara Ct,
Cypress, TX 77433

CHRISTINE CARROLL;
11298 Snow View Ct,
Yucaipa, CA 92399

TRAVIS MARKER; THE LAW OFFICE OF TRAVIS R. MARKER, A
PROFESSIONAL CORPORATION (D.B.A. "MARKER LAW AND
MEDIATION"); & PARLAY LAW GROUP A PROFESSIONAL
CORPORATION
333 2nd St.
Suite 16,

1 Ogden, UT, 84404

2 MATTHEW CROUCH;

3 Via email to his attorney Levi Y. Silver at lsilver@swsslaw.com

4 REYHAN PASINLI & TOTAL-APPS, INC.

5 Via email to their attorney Geoffrey Brethen at gbrethen@wattslawyers.com

6 TROY MARCHAND & QUANTUM ECOMMERCE

7 Via email to their attorney Marc Reich at mgr@reichradcliffe.com

8 BONNIE NICHOLS & WHOLESALE UNIVERSE;

9 Via email to their attorney Brad Geyer at bradford.geyer@formerfedsgroup.com

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing statements in this Certificate of Service are true and correct.

12 /s/Nico Banks

13 Nico Banks

14 Dated: July 24, 2024